

# UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

United States of America

v.

Case No.

)  
)  
)  
)  
)  
)  
)

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of \_\_\_\_\_ in the county of \_\_\_\_\_ in the

\_\_\_\_\_ District of \_\_\_\_\_, the defendant(s) violated:

*Code Section*

*Offense Description*

This criminal complaint is based on these facts:

☐ Continued on the attached sheet.



*Complainant's signature*

\_\_\_\_\_  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Judge's signature*

City and state: \_\_\_\_\_

\_\_\_\_\_  
*Printed name and title*

Attachment A

1. On Friday, January 31, 2025, the Bureau of Alcohol, Tobacco, Firearms and Explosives, Laredo Police Department, Laredo Police Department officers and SWAT, Border Patrol BORTAC, DEA Laredo, Texas DPS, HSI Laredo, and ICE ERO executed a federal search warrant on the 3000 block of Monterrey Street, Laredo, Texas 78046.
2. During the execution of the search warrant, Jose Guadalupe HERNANDEZ-Garza was removed from the residence by Laredo Police Department SWAT. Department of Homeland Security, Homeland Security Investigations and U.S. Immigration and Customs Enforcement, Enforcement Removal Operations agents verified that HERNANDEZ-Garza was an alien illegally inside of the United States.
3. Agents and officers conducted a search of the residence and discovered a bedroom suspected of belonging to HERNANDEZ-Garza containing two firearms, drugs, a scale, and HERNANDEZ-Garza's Mexican Passport. The firearms were identified as a Davis Industries, model P-380, .380 auto caliber pistol bearing serial number AP118932 and a Cobra Enterprises Inc., model Patriot, 9mm pistol bearing serial number 06219.
4. HERNANDEZ-Garza was taken into custody by HSI and ICE.
5. The firearms and evidence were taken into ATF custody. A preliminary examination of the firearms indicated that they were manufactured outside of the State of Texas therefore traveling in or affecting interstate commerce.
6. Possession of a firearm by an alien illegally in the United States is a violation of 18 USC 922(g)(5).